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October 6, 2022

VIA ECF

United States District Court
Southern District of New York
Attn: Jennifer L. Rochon, U.S.D.J.
500 Pearl Street, Courtroom 20B
New York, NY 10007-1312

Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, *et al.*
S.D.N.Y. Case No.: 1:21-cv-3858 (VM) (KHP)
MLLG File No. 123-21

Dear Judge Rochon:

This firm represents the Star Defendants in the above-referenced case. This letter is submitted jointly by all parties pursuant to the Court's September 22, 2022 Order directing the parties to submit a joint status report.

Star Defendants and Plaintiff, Rosenfield & Co., PLLC have been exchanging paper discovery and have agreed to continue to produce documents on a rolling basis. Additional documents still need to be produced, and given the extensive amount of documents, the parties will need time to review and analyze the documents.

The Trachtenberg, Rodes & Friedberg LLP Defendants ("TRF Defendants") will be filing a motion to dismiss for which the Court recently endorsed the parties' briefing schedule. Pursuant to the Court's September 30, 2022 Order, the motion will be fully briefed on December 16, 2022. Because of the anticipated motion to dismiss, Star and TRF Defendants have not exchanged discovery demands. TRF Defendants and Plaintiff have also agreed to hold written discovery and document production in abeyance, and have been discussing the possibility of a global mediation.

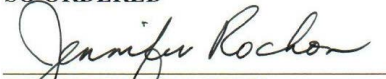
To preserve economic resources, the parties respectfully request that they be permitted to agree to hold certain discovery as well as all depositions in abeyance until after TRF Defendants' motion to dismiss is decided by the Court.

Respectfully submitted,

/s/ _____
Jamie S. Felsen

via ECF (all counsel of record).

SO ORDERED


JENNIFER L. ROCHON
United States District Judge

Request **DENIED**. The parties may file a request for extension of discovery deadlines with a proposed revised civil case management plan and scheduling order pursuant to the Court's Individual Rule of Practice 1(F). In addition, to assist the parties in their discussion of a global mediation, conserve resources, and in an effort to achieve a faster disposition of this matter, the parties may request that the Court refer the case to the court-annexed mediation program or a magistrate judge for a settlement conference.

Dated: October 7, 2022
New York, New York